

94-102

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February 3, 2003

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: *American Cellular Corporation E911 Quarterly Report -  
CC Docket No. 94-102*

Dear Ms. Dortch:

American Cellular Corporation and its subsidiaries, by its attorneys, hereby submit the attached Quarterly Report on their progress toward and compliance with the terms and conditions of the *Order to Stay* and the Commission's E911 rules.<sup>1</sup>

If there are any questions regarding this matter, please contact the undersigned.

Sincerely,

WILKINSON BARKER KNAUER, LLP



By: Lee J. Rosen

Attachment

cc: David H. Solomon, Chief, Enforcement Bureau  
Thomas I. Sugrue, Chief, Wireless Telecommunications Bureau  
John Ramsey, Executive Director, APCO  
Robert M. Gurss, Counsel, APCO  
Terry Peters, Executive Director, NENA  
James R. Hobson, Counsel, NENA and NASNA  
Evelyn Bailey, NASNA

<sup>1</sup> See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay. 17 FCC Rcd 14841 (2002) ("*Order to Stay*").

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E911 Status - Quarterly Report

February 3, 2003

Summary of Report

Pursuant to the Order to Stay,<sup>1</sup> American Cellular Corporation,<sup>2</sup> as a Tier II carrier, provides in this Quarterly Report ("Report") information on all pending requests for Phase I and Phase II it has received, including the entity requesting service, the date the request was received,<sup>3</sup> and the status of the request. For Phase I requests that have been pending for over six months, ACC has also included the projected deployment date (if available) and a brief description of the reasons for the delay and steps it has taken to resolve the issues causing the delay. Detailed information regarding the requests is contained in the attached table.

Phase I Service

ACC has received 75 requests for Phase I services and has activated service in all or in part in 58 of these jurisdictions. ACC has worked diligently with its third-party location solution vendors. TCS Corp. and Intrado, as well as the public safety community, in coordinating Phase I deployment.

As previously reported, ACC continues to treat the remaining 17 fully-pending and 7 partially-pending Phase I requests as valid, although all would no longer be active pursuant to Section 20.18(j) and the Richardson criteria.<sup>4</sup> The company remains committed to working with its vendors, the PSAPs, and the states, in order to deploy Phase I services in these jurisdictions as soon as possible.

Phase II Service

A. Deployment Preparation

As discussed in its waiver petition, ACC is a mid-sized carrier servicing predominantly rural and suburban markets in 12 states. The company relies primarily upon a TDMA-based network of base stations and switching equipment. As a result of the lack of commercial availability of compliant handset-based Phase II location solution<sup>5</sup>; for TDMA carriers, the company has taken steps to prepare to deploy a network-based solution.

ACC's network consists of approximately 9 Mobile Switching Centers, all of which utilize equipment manufactured by Nortel Networks ("Nortel"). ACC has worked with Nortel

<sup>1</sup> See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Order to Stay, 17 FCC Rcd 14841 (2002) ("Order to Stay").

<sup>2</sup> This Report is being filed on behalf of American Cellular Corporation and its subsidiaries (collectively "ACC").

<sup>3</sup> As indicated in the table, the provided "request date" indicates the date the PSAP/requesting entity sent its request to ACC. This date may not correspond with the date the PSAP's/requesting entity's request was "valid" per Section 20.18(j) of the rules.

<sup>4</sup> 47 C.F.R. § 20.18(j); Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson, CC Docket No. 94-102, Order, 16 FCC Rcd 18982 (2001) ("Richardson").

to prepare for Phase II deployment; all switch upgrades necessary to supply Phase II services were completed by Nortel by June, 2002.

In addition, ACC has executed an exclusive contract with Grayson Wireless to provide the PDE equipment necessary to deploy its Phase II network-based location solution. The vendor has contracted to provide compliant Phase II services in response to the PSAP requests in Hocking County, OH; the State of Minnesota; Rowan County, KY; and Montgomery County, KS as discussed below. In fact ACC hopes to deploy Phase II services to 100% of the area in these jurisdictions by the March 2003 deadline or within 6 months of receipt of the Phase II request, and thus exceed its obligations. If the situation does not allow for deployment, however, ACC intends to work closely with each PSAP to determine an implementation schedule so that Phase II services can commence.

### **B. Phase II Requests**

ACC has received requests for Phase II service from the following jurisdictions: Hocking County, OH; the State of Minnesota; Rowan County, KY; and Montgomery County, KS. In response to Hocking County, on October 3, 2002, the company sent correspondence to the appropriate contact, stating that it is tentatively considering its request "valid" and intends to provide Phase II services by March 1, 2003. Nevertheless, to ensure that it may properly prioritize its E911-designated resources, ACC requested that the Hocking County PSAP provide documentation pursuant to the Richardson proceeding.<sup>7</sup> ACC received a response from Hocking County on October 7, 2002. ACC subsequently sent a follow-up letter on January 10, 2003 requesting documentation pursuant to Richardson and regardless of Hocking's response, ACC is tentatively treating the request as valid and is moving forward with its Phase II deployment plans for the jurisdiction. As discussed below, ACC has only one cell tower in Hocking County, but is hoping to reach a solution to enable deployment of Phase II technology.

As detailed in the table, after repeated attempts to confirm the status of readiness of the PSAPs located in the state, ACC no longer considers Minnesota's Phase II request active. The company will proceed further with Phase II in Minnesota upon receipt of a new request for Phase II services and documentation of future readiness.

ACC has also attempted to confirm the status of readiness of the PSAP in Rowan County on several occasions and continues to do so. The County responded in part to ACC's requests for information, but has not provided the requested documentation pursuant to the Richardson criteria.<sup>8</sup> ACC continues to discuss an implementation date with Rowan County administrators and remains committed to meeting its E911 Phase II obligations based upon appropriate assurances that the PSAP meets the Commission's readiness criteria.

ACC received Montgomery County's combined request for E911 services on July 15, 2002. During Phase I deployment, ACC learned that the PSAP had no trunking from the respective selective router at the time it submitted its request. In light of this discovery, ACC sent correspondence on October 29, 2002 requesting documentation of the County's Phase II readiness and received the requested documentation. As discussed in the report, ACC is in discussions with the PSAP to work out an alternative launch date for delivery of Phase II services.

### **C. Deployment Issues**

As a Tier II provider employing a network-based Phase II solution, pursuant to the Order to Stay, ACC intends to provide Phase II service to 100 percent of a requesting PSAP's coverage area in Rowan County and Montgomery County or population beginning March 1, 2003, or within six months, whichever is later. ACC remains committed to meeting these deployment benchmarks in response to valid PSAP requests for Phase II service. However, ACC may encounter logistical problems in meeting this deadline. As a result, and given all best faith efforts to deploy, ACC has resolved to deploy to 100 percent of the PSAP's coverage area as soon as deployment is possible.

In Hocking County, despite its best faith efforts, however, Dobson's network design may render meeting these accuracy standards impossible. As mentioned above, Dobson provides service via only one cell tower. Dobson is proceeding with Phase II deployment in accordance with applicable deadlines, but has yet to resolve the manner in which it will meet the accuracy standards. Dobson has engaged in discussions with a prominent nationwide carrier to discuss the possibility of collocating E911 facilities antennas on each other's tower's to facilitate the Grayson solution's triangulation techniques. Dobson is also discussing the possibility of collocating an antenna on the PSAP's tower in an effort to meet the accuracy requirements. Neither of these plans has yet to come to fruition and may ultimately prove cost-prohibitive or infeasible from an engineering perspective.

Furthermore, in discussions with Grayson Wireless, ACC has learned that leasing and zoning issues may affect ACC's ability to meet the interim deployment deadlines in some markets. Specifically, in order to meet the Commission's network-based accuracy requirements, Grayson Wireless has informed the company that it may need to install Angle-of-Arrival ("AOA") antennas at certain cell sites in addition to the Time Difference of Arrival ("TDOA") equipment that will be installed in individual cell sites. ACC has also been informed that installing AOA antennas may require tower modifications, lease modifications, and zoning approvals – any of which present the potential for delay.

ACC is bringing this to the Commission's attention as a potential issue that may affect ACC's ability to provide compliant Phase II services by March 1, 2003. Furthermore, ACC brought similar matters to the Commission's attention in its original waiver request. Accordingly, if necessary, ACC may avail itself of further waiver procedures to account for the potential market-specific shortcomings a network-based solution in its rural markets may present. The Commission has indicated that it will consider such requests.<sup>3</sup>

As required by the Order to Stay, a copy of this report is being filed with the Chief of the Enforcement Bureau, the Chief of the Wireless Telecommunications Bureau, and the Executive Directors and Counsels of APCO, NENA, and NANSA.

Sincerely,

  
Ronald L. Ripley  
Secretary

RLR:scd

<sup>3</sup> See American Cellular Corporation Petition for Waiver of Sections 20.18(e), (f), and (h) of the Commission's Rules, CC Docket No. 94-102, at 11-15 (filed Sept. 4, 2001).

<sup>4</sup> See Order to Stay at ¶ 41.

American Cellular Corporation  
Wireless E9-1-1 Phase I & II  
Service & "Request" Summary

STATUS OF PHASE I DEPLOYMENT

State	County	Requesting Entity Name	Request Date <sup>1</sup>	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
KY		Laurel County	11/10/00	Service activated 11/28/01 PSAP certified but not ready to receive Phase I data.		
KY	Barren	Barren/Metcalf	N/A	Service activated 11/27/01		
KY	Nelson	Nelson County	N/A	Service activated 11/27/01 to Kentucky State Police Post # 4		
KY	Rockcastle	Rockcastle County	N/A	Service activated 9/24/01 to Kentucky State Police Post # 11		
KY	Wayne	Wayne County	N/A	Service activated 9/24/01 to Kentucky State Police Post # 11		
KY	McCreary	McCreary County	N/A	Service activated 9/24/01 to Kentucky State Police Post # 11		
KY	Mason	Mason County	N/A	Service activated 8/29/01		
KY	Hart	Hart county	N/A	Service activated 8/21/01 to Kentucky State Police Post # 3		
KY	Danville	Danville County	N/A	Service activated 8/14/01		
KY	Boyle	Boyle County	N/A	Service activated 8/14/01		
KY	Bath	Bath County	N/A	Service activated 6/05/01		

<sup>1</sup> Indicates date PSAP sent letter to ACC requesting service; does not correspond with date PSAP's request was "valid" per Section 20.18(j) of the rules

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
				to Kentucky State Police Post # 8		
KY	Lewis	Lewis County	N/A	Service activated 6/05/01 to Kentucky State Police Post # 8		
KY	Menifee	Menifee County	VIA	Service activated 5/31/01 to Kentucky State Police Post # 7		
KY	Lincoln	Lincoln County	N/A	Service activated 5/31/01 to Kentucky State Police Post # 7		
KY	Russell	Russell County	N/A	Service activated 5/18/01 to Kentucky State Police Post # 15		
KY	Cumberland	Cumberland County	N/A	Service activate 5/18/01 to Kentucky State Police Post # 15		
KY	Clinton	Clinton County	N/A	Service activated 5/18/01 to Kentucky State Police Post # 15		
KY	Spencer	Spencer County	N/A	Service activated 8/09/01 to Kentucky State Police Post # 12		
KY	Montgomery	Montgomery County	N/A	Service activated 9/19/01 to Kentucky State Police Post # 8		
KY	Madison	Madison County	N/A	Service activated 7/13/01		
KY	Morehead/Rowan	Morehead Rowan County	11/09/01	Service activated 12/07/01 to Kentucky Police Post # 2.		
KY	Adair	Adair County	07/02/01	Service activated 12/06/01		

State	County	Requesting Entity Name	Request Date <sup>1</sup>	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
KY	Monroe	Monroe County	01/04/01	Service activated 3/21/02 PSAP certified but not ready to receive Phase I datahue to CPE.		
KY	Taylor	Taylor County	12/04/00	Service activated 3/22/02 Trunks from <b>LEC</b> delayed. PSAP certified but not ready to receive Phase I data due to CPE.		
KY	Mercer	Mercer County	04/30/01	Service activated 5/01/02 (PSAP <b>was</b> not Phase I capable at time of request.) PSAP trunks from Selective Router to PSAP not ready.		
KY	<b>Pulaski</b>	Pulaski county	07/17/00	Service activated 12/05/01 PSAP was certified but not ready to receive Phase I datahue to CPE.		
KY	Anderson	Anderson County	02/28/01	Service activated 2/18/02 Trunks from Selective Router to PSAP not correct.		
KY	Hardin	Hardin County	07/06/00	Service activated 12/20/01 PSAP was awaiting certification from the CMRS Board. CPE not ready.		
KY	<b>Larue</b>	Lame County	07/17/00	Service activated 12/19/01 PSAP was not Phase I capable at the time of request. PSAP CPE not		

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Months	Expected Deployment Date
KY	Green	Green County/Greensburg	12/12/00	ready. PSAP requested address changes and RF Maps.	Service activated 12/11/01 PSAP was awaiting certification from the CMRS Board. Trunking problems with the LEC. PSAP CPE not ready.	
KY	Casey	Casey County	N/A	Service activated 12/14/01 to Kentucky State Police Post # 15		
KY	Bracken	Bracken County	N/A	Service activated 4/19/02 to Kentucky State Police Post # 6		
KY	Nicholas	Nicholas County	N/A	Service activated 4/19/02 to Kentucky State Police Post # 6		
KY	Robertson	Robertson County	N/A	Service activated 4/23/02 to Kentucky State Police Post # 6		
WV	Marion	Office of Emergency Management of the State of West Virginia	06/01/00	Service activated 4/11/01 Cost recovery issues.		
WV	Monongalia	Office of Emergency Management of the State of West Virginia	06/01/00	Service activated 3/30/01 Cost recovery issues.		
WV	Harrison	Office of Emergency Management of the State of West Virginia	06/01/00	Service activated 3/30/01 Cost recovery issues.		
WV	Preston	Office of Emergency Management of the State of West Virginia	06/01/00	Service activated 4/11/01 Cost recovery issues.		



State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
		of West Virginia				
WV	Taylor	Office of Emergency Management of the State of West Virginia	06/01/00	Service activated 8/27/02 PSAP CPE not capable.		
MI	Marquette	Michigan Communications Director Association	04/30/01	Service activated 2/21/02 State administrative issues.		
MI	Dickinson	Michigan Communications Director Association	04/30/01	Service activated 2/21/02 State administrative issues.		
MI	Meeminee	Michigan Communications Director Association	04/30/01	Service activated 2/25/02 State administrative issues.		
MI	Iron	Michigan Communications Director Association	04/30/01	Service activated 2/27/02 State administrative issues.		
MI	Ontonagon	Michigan Communications Director Association	04/30/01	Calls to be delivered to Negaunee PSAP. County does not yet have Enhanced 9-1-1 capability.	ACC is ready to deploy. Did not receive formal request as calls are to be routed to Negaunee PSAP instead.	02/28/03
MI	Keweenaw	Michigan Communications Director Association	04/30/01	Calls to be delivered to Negaunee PSAP. County does not yet have Enhanced 9-1-1 capability.	ACC is ready to deploy. Did not receive formal request as calls are to be routed to Negaunee PSAP instead.	02/28/03
MI	Houghton	Michigan Communications Director Association	04/30/01	Service activated 3/28/02. Administrative issues.		
MI	Baraga	Michigan Communications Director Association	04/30/01	Calls to be delivered to Negaunee PSAP. County does not yet have Enhanced 9-1-1 capability	ACC is ready to deploy. Did not receive formal request as calls are to be routed to Negaunee PSAP instead.	02/28/03
MI	Gogebic	Michigan	04/30/01	Calls to be delivered to	ACC is ready to deploy. Did not	02/28/03

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
		Director Association		Negaunee PSAP. County does not have Enhanced 9-1-1.	receive formal request as calls are to be routed <i>to</i> Negaunee PSAP instead.	
MN	Aitkin	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Received mapping and routing. Testing to begin in February 2003.	Conference calls with State, Carrier and Third party provider	02/28/03
MN	Becker	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	2 of 4 sites activated on 6/27/02. Third site activated on 12/30/02.  State: Awaiting approval by State for mapping and routing technology for remaining 1 cell site.	Conference calls with State, Carrier and Third party provider.	02/28/03
MN	Beltrami	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	2 of 3 cell sites activated on 7/10/02.  State: Awaiting approval by State for mapping and routing technology for remaining cell site.	Conference calls with State, Carrier and Third party provider.	02/28/03
MN	Carlton	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	State: Awaiting approval by State for mapping and routing technology.	Conference calls with State, Carrier and Third party provider	02/28/03
MN	Cass	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	8 of 12 cell sites activated on 7/10/02.  State: Awaiting approval by State for mapping and routing technology for	Conference calls with State, Carrier and Third party provider.	02/28/03

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
				remaining 4 cell sites.		
MN	Crow Wing	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Received mapping and routing approval. Testing to begin in February 2003.	Conference calls with State, Carrier and Third party provider,	02/28/03
MN	Douglas	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Service activated on 6/27/02. State administrative issues		
MN	Grant	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Service activated on 7/08/02. State administrative issues.		
MN	Hubbard	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	State: Awaiting approval by State for mapping and routing technology.	Conference calls with State, Carrier and Third party provider.	02/28/03
MN	Itasca	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	7 of 8 cell sites activated on 7/12/02.  State: Awaiting approval by State for mapping and routing technology for remaining cell site.	Conference calls with State, Carrier and Third party provider.	02/28/03
MN	Kanabec	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Service activated on 7/03/02. Administrative issues.		
MN	Koochiching	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Received mapping and routing approval. Testing to begin in February 2003.	Conference calls with State, Carrier and Third party provider.	02/28/03

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
MN	Lake	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Received mapping and routing approval. Testing to begin in February 2003.	Conference calls with State, Carrier and Third party provider.	02/28/03
MN	Miller Lakes	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	State: Awaiting approval by State for mapping and routing technology.	Conference calls with State, Carrier and Third party provider.	02/28/03
MN	Morrison	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	31/31/01	State: Awaiting approval by State for mapping and routing technology	Conference calls with State, Carrier and Third party provider.	02/28/03
MN	Otter Tail	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Service activated on 6/27/02. Administrative issues.		
MN	Pine	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	5 of 7 cell sites activated on 6/27/02.  Received approval of mapping and routing of all sites. Testing to begin in February 2003.	Conference calls with State, Carrier and Third party provider.	02/28/03
MN	Pope	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Received approval of mapping and routing, Testing to begin in February 2003.	Conference calls with State, Carrier and Third party provider.	02/28/03
MN	St Louis North	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	14 of 17 cell sites activated on 8/02/02.  State: Awaiting approval by State for mapping and	Conference calls with State, Carrier and Third party provider.	02/28/03

State		Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
				routing technology for remaining 3 cells.		
MN	St Louis South	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	18 of 26 cell sites activated on 8/23/02.  State: Awaiting approval by State for mapping and routing technology for remaining 8 cells.	Conference calls with State, Carrier and Third party provider.	02/28/03
MN	Swift	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Service activated on 5/06/02. Administrative issues.		
MN	Todd	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Received approval of mapping and routing. Testing to begin in February 2003.	Conference calls with State, Carrier and Third party provider.	02/28/03
MN	Wadena	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Service activated on 5/06/02. Administrative issues.		
MN	Wilkin	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	01/31/01	Received approval of mapping and routing. Testing to begin in February 2003.	Conference calls with State, Carrier and Third party provider.	02/28/03
OH	Hocking	Hocking County	03/01/02	Service activated on 6/18/02.		

State	County	Requesting Entity Name	Request Date	Status/Reason for Delay	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
KS*	Montgomery	Montgomery County	7/15/02	Deployment underway. At time of request, the PSAP did not have trunking from the S/R. Nevertheless, ACC began the process of deploying Phase I services, and the PSAP has since obtained the trunking LEC required login ID for ALI DB provisioning.	Not applicable. as request has not been pending for six months. Nevertheless, ACC has worked closely with the PSAP and has worked diligently to deploy Phase I services in the County within 6 months of the request. - i.e., by 1/15/03 Obtained login ID and provisioned ALI DB.	2/28/03.
NY*	Schohane	New York State Police	11/4/02	NIA	N/A	5/5/03

**STATUS OF RESPONSE TO PHASE II INQUIRIES REQUEST--**

State	County	Requesting Entity Name	Request Date	Status	Steps Taken to Resolve Deployment Problems	Expected Deployment Date
MN*	All counties serviced by ACC as listed above in Phase I Table.	State of Minnesota, Department of Administration, Statewide 9-1-1 Program	1/31/2001	<ul style="list-style-type: none"> <li>- ACC responded to State of Minnesota ("State") by letter, (dated 4/17/2001), requesting verification of Phase II capabilities and cost recovery mechanism.</li> <li>- State did <b>not</b> respond to</li> </ul>	ACC has made repeated attempts to confirm County's Phase II capabilities and whether it has a cost recovery mechanism in place for Phase II deployment.	ACC no longer considers MN's Phase II request active and has no plans to deploy Phase II in the state until it receives a new request or documentation pursuant to <b>Richardson</b> criteria.

				<p>request.</p> <p>. <b>ACC</b> filed Petition for Waiver of <b>FCC's</b> Phase II rules (9/4/01).</p> <p>- State of Minnesota filed letter (dated 9/11/01) with <b>FCC</b> seeking correction to text of <b>ACC's</b> Petition for Waiver.</p> <p>- <b>ACC</b> replied again requesting documentation of readiness.</p> <p>- To date, <b>ACC</b> has not received demonstration from the State re: its Phase II capabilities or the status of a cost recovery mechanism.</p> <p>- <b>ACC</b> sent letter (dated 1/9/03 requesting documentation of readiness. To date, <b>ACC</b> has not received demonstration from the State re: Phase II capabilities or the <b>status</b> of cost recovery mechanism.</p>		
KY	Rowan	Morehead Police	5/15/02	<p>- <b>ACC</b> responded to Rowan County ("County") by letter, (dated <b>5/22/2002</b>) requesting demonstration of capabilities and cost recovery mechanism to which there was no reply.</p> <p>- <b>ACC</b> sent second letter to the County on 7/30/02</p>	<p><b>ACC</b> has made repeated attempts to confirm County's Phase II capabilities and whether it has a cost recovery mechanism in place for Phase II deployment.</p> <p><b>ACC</b> has been contacted</p>	<p><b>ACC</b> will discuss timing of delivery of Phase II services with County upon demonstration of readiness pursuant to <b>Richardson</b> proceeding <b>ACC</b> intends to deploy Phase II in county, but will not be able to meet the 3/1/03 deadline for Tier II carriers. <b>ACC</b> is involved in ongoing discussions with <b>PSAP</b> to</p>

			<p>requesting verification of readiness</p> <ul style="list-style-type: none"> <li>• County replied by letter (received <b>8/19/2002</b>) notifying ACC that it employs a NCAS Phase I solution and that a third-party vendor has schedule Phase II software upgrade</li> <li>• ACC sent follow-up correspondence (dated <b>8/28/02</b>), requesting clarification of the information provided <b>8/19/02</b>, and complete demonstrations of readiness pursuant to <i>Richardson</i>.</li> </ul> <p>ACC has received no response to its <b>8/26/02</b> correspondence.</p> <ul style="list-style-type: none"> <li>• ACC sent letter <b>11/26/02</b> requesting statement of readiness in writing.</li> <li>• Rowan responded with letter (<b>12/3/02</b>) but provided no documentatio</li> <li>• ACC sent further follow. up letter (dated <b>1/9/03</b>) requesting information of readiness and cost recovery mechanism.</li> </ul> <p>County replied by letter (dated 1/14/03) stating without documentation tha PSAP has mechanism for</p>	<p>by LEC (Alltel) to disc; their implementation schedule for providing t necessary tandum and trunking upgrades. ACC has left voice message v LEC to call back to discuss.</p>	<p>etermine alternative date.</p>
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				cost recovery, has deployed Phase I with an NCAS solution, and LEC notified of intent to implement Phase II and has requested all necessary software and hardware upgrades.		
KS	Montgom	Montgomery County*	7/15/02	<ul style="list-style-type: none"> <li>Because of complications with Phase I deployment in Montgomery County, ACC sent correspondence to County (dated <b>10/29/02</b>) requesting demonstration of readiness pursuant to <b>Richardson</b>.</li> <li>County replied by letter (dated <b>11/25/02</b>) stating that a cost recovery mechanism is in place and that all equipment has been ordered for upgrade.</li> </ul>	N/A	<p>It does not appear that service will be deployed by March 1, 2003. However, ACC is in discussions to hopefully work out an alternative target launch date for delivery of Phase II services with County. ACC may seek very limited relief beyond the March 1 date.</p>
OH	Hocking	Hocking County	10/31/02	<ul style="list-style-type: none"> <li>ACC responded to County by letter, (dated <b>4/15/2002</b>) requesting verification of capabilities and cost recovery mechanism.</li> <li>County replied to this letter on <b>4/16/2002</b> notifying ACC of particular Phase II compliant capabilities.</li> <li><b>ACC</b> sent letter 10/3/02 notifying County that it is considering request to</li> </ul>	VIA	<p>It does not appear that service will be deployed by March 1, 2003. ACC maintains only one cell site and accuracy may be a problem in the County. ACC has maintained contact and continued to work with 'SAP to resolve deployment issues. ACC has discussed other potential options including possible collocation with other carriers or on 'SAP towers. ACC intends to deploy fully once these issues can be resolved.</p>

				<p>be “valid” and plans to deliver Phase II services by 3/1/03, but <b>also</b> is requesting documentation pursuant to <b>Richardson</b>.</p> <p>- County replied by letter (dated 10/7/02) stating County fully Phase II compliant and that LEC has indicated no cost recovery mechanism in place, but will not cause delay.</p> <p>- <b>ACC</b> replied by letter (dated 1/10/03) requesting copies of documentations for necessary funding and upgrade order to the LEC.</p> <p>- <b>County</b> replied by letter (dated 1/13/03) stating that Phase II is in service with 2 of 5 wireless carriers in county.</p> <p>. <b>ACC</b> signed contract with Grayson Wireless <b>12/13/02</b> to provide network-based solution.</p>		
Y*	choharie	lew York State olice	1/4/02	<p>.ACC sent letter 11/13/02 to request documentation pursuant to <b>Richardson</b>,</p> <p>County responded with letter (12/30/02) but</p>	N/A	5/03

	provided no documentation.	
	- ACC will treat request as valid and intends to	

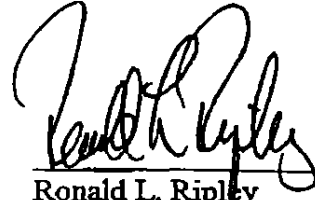
\* Contact indicated entity was "requesting" deployment of both Phase I and Phase II services.

**AFFIDAVIT OF RONALD L. RIPLEY**

I, Ronald L. Ripley, do hereby declare that *the* following is true and accurate:

I ~~am~~ an officer of American Cellular Corporation ("ACC").

I have reviewed the ACC E911 Phase II Quarterly Report ("Report") and to the best of my knowledge, information, or belief, all of the ~~information~~ contained in the Report is truthful and accurate.

  
Ronald L. Ripley  
Secretary

Executed on: Feb 3, 2003

## CERTIFICATE OF SERVICE

I, Karla Huffstickler, hereby certify that on the 3rd day of February **2003**, copies of ~~the~~ foregoing "Quarterly Report" were sent by first class mail, postage pre-paid, or by hand delivery (\*) to the following:

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Federal Communications Bureau  
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Karla Huffstickler